

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN E. PRICE AND SHIRLEY L. PRICE,

Defendants.

CASE NO. 3:07-CV-5218-FDB

JOINT STIPULATION REGARDING
CONTINUATION OF CIVIL CASE
SCHEDULE AND [PROPOSED]
ORDER

NOTE ON MOTION CALENDAR:
Monday, April 21, 2008

The parties hereby jointly stipulate to and respectfully request the issuance of an order continuing the date currently set for trial in this case and adopting the revised pretrial schedule set forth below.

The Court established the litigation schedule in this case on September 12, 2007. (Minute Order Scheduling Jury Trial and Pretrial Dates (Docket No. 16).) Since that time, the parties have begun settlement discussions and conducted written discovery, exchanging interrogatories and document productions. The parties agree that further discussions about the possibility of settlement are desirable, and a continuation of the civil case schedule will allow for such discussions. The parties propose the revised pretrial schedule set forth below to allow such additional time for further discussion of settlement.

Accordingly, the parties respectfully submit that good cause exists for the Court to issue an order continuing the civil case schedule, and they propose the following revised pretrial schedule, which would extend by approximately 90 days all remaining deadlines:

1 Disclosure of expert witnesses and their opinions by 07/21/2008
2 Disclosure of rebuttal experts and their opinions by 08/19/2008
3 Objection to the oppositions' experts by 09/18/2008
4 Discovery cut-off and filing date for amended pleadings by 09/29/2008
5 Completion of mediation process and letter of compliance by 10/08/2008
6 All remaining motions, including DISPOSITIVE MOTIONS, by 10/20/2008
7 Filing of Trial Briefs, Motions in Limine, Proposed Jury Instructions, and
8 lodging Proposed Pre-Trial Order by 12/18/2008
9 Pre-Trial Conference on 01/09/2009 at 2:00 pm
10 Trial for four days beginning on 01/26/2009 at 9:00 am.

11 Respectfully submitted,

12 Dated: April 21, 2008

13 s/ signed on original

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19 Dated April 21, 2008

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IT IS SO ORDERED.

Dated this 22nd day of April, 2008.

A handwritten signature in black ink, appearing to read 'Franklin D. Burgess', is written over a horizontal line.

The Honorable Franklin D. Burgess
United States District Court Judge

Certificate of Service

I, Christopher J. Fregiato, certify that on this 21st day of April, 2008, I electronically filed with the Clerk of Court this *Joint Stipulation Regarding Continuation of Civil Case Schedule and [Proposed] Order* on the joint behalf of the parties using the CM/ECF system, which will send notification of such filing to the following individuals:

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